

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

PIERCE COUNTY REPUBLICAN
PARTY,

Plaintiff,

v.

ERIC EUGENE CROWL,

Defendant.

CASE NO. C25-5251 BHS

ORDER

THIS MATTER is before the Court on Plaintiff Pierce County Republican Party's motions (1) for imposition of order requiring defendant to reimburse plaintiff for service fees under Federal Rule of Civil Procedure 4(d)(2), Dkt. 27; and (2) for default against defendants Eric Crowl and his nonprofit corporations, "Pierce County Republican Party," and "Washington47 PAC," Dkt. 31.

The former motion was filed June 13, 2025, and properly noted for July 10. Defendants' response to the motion was due 15 days after the motion was filed, or Monday, June 30. Western District of Washington Local Rule (LCR) 7(d)(3). They did

1 not file a response. The Court may consider a party's failure to respond to a motion "an
2 admission that the motion has merit." LCR 7(b)(2).

3 Plaintiff's motion for the recovery of service of process fees (and reasonable
4 attorneys' fees) under Rule 4(d)(2)(A) and (B) does have merit, and the Court considers
5 defendants' failure to respond to it an admission of the same. The motion is **GRANTED**,
6 and defendants are **ORDERED** to pay plaintiff \$125 in service fees and \$140 in
7 reasonable attorneys' fees within 30 days.

8 Plaintiff's motion for default¹ demonstrates that defendants were served June 13,
9 2025. Dkt. 31-1. Under Federal Rule of Civil Procedure 12(a)(1)(A)(i), defendants were
10 required to "answer or otherwise defend" under Rule 12, within 21 days. Accounting for
11 the July 4 Holiday and the following weekend, defendants were required to respond by
12 Monday, July 7. Crowl filed a Rule 12(b)(6) motion to dismiss on July 8. Such a filing
13 would normally be sufficient to avoid default, but pro se defendant Crowl does not
14 appear to be an attorney admitted to practice in this Court, and he cannot represent any
15 other person or entity, including his wholly owned non-profit corporations.

16 Representing another person or entity in court is the practice of law. To practice
17 law, one must be an attorney. RCW 2.48.170. Thus, Washington, like all federal courts,
18 follows the common law rule that corporations appearing in court proceedings must be
19 represented by an attorney. There is a pro se exception to this general rule, under which a

20
21 ¹ Plaintiffs' motion includes a caption "motion for default judgment" but the motion itself
22 and its CM/ECF entry seek only entry of default. The motion does not address a default
judgment or provide a proposed order. See LCR 7(b)(1). A motion for default is a "same day"
motion. LCR 7(d)(1).

1 person ““may appear and act in any court as his own attorney without threat of sanction
2 for unauthorized practice.”” *Cottringer v. State, Dep’t of Employment Sec.*, 162 Wn. App.
3 782, 787, (2011) (quoting *Wash. State Bar Ass’n v. Great W. Union Fed. Sav. & Loan*
4 *Ass’n*, 91 Wn.2d 48, 56 (1978)).

5 The pro se exception is extremely limited and applies “only if the layperson is
6 acting solely on his own behalf” with respect to his own legal rights and obligations.
7 *Cottringer*, 162 Wn. App. at 787–88 (quoting *Wash. State Bar Ass’n*, 91 Wn.2d at 57).
8 Although a non-attorney may appear *in propria persona* in his own behalf, that privilege
9 is personal to him. *McShane v. United States*, 366 F.2d 286, 288 (9th Cir. 1966). He has
10 no authority to appear as an attorney for anyone other than himself. *Russell v. United*
11 *States*, 308 F.2d 78, 79 (9th Cir. 1962); *Collins v. O’Brien*, 208 F.2d 44, 45 (D.C. Cir.
12 1953), *cert. denied*, 347 U.S. 944 (1954). *See also* LCR 83.2(b)(4) (“A business entity,
13 except a sole proprietorship, must be represented by counsel.”).

14 Accordingly, the defendants “Pierce County Republican Party” and
15 “Washington47 PAC” have not appeared, answered, or otherwise defended this action,
16 and they are in default. Plaintiff’s motion for default as to pro se defendant Crawl is
17 **DENIED**. Its motion as to the unrepresented non-profit defendants is **GRANTED**.

18 The Court will address Crawl’s recently filed motions, Dkts. 40, 41, and 42, in a
19 separate order. In the meantime, he should file proposed orders for each such motion.
20 LCR 7(b)(1). Finally, the Court acts on motions, properly noted under the civil and local
21 rules. It does not typically respond to “notices” or “requests,” like those Crawl submitted
22 at Dkt. 29.

IT IS SO ORDERED.

Dated this 10th day of July, 2025.

Ben L. Ertle

BENJAMIN H. SETTLE
United States District Judge